

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

SEALED

13 CR 597

UNITED STATES OF AMERICA

vs.

1. GALINDO MELLADO-CRUZ (Counts 1, 2, 31)
aka Comandante Mellado
2. ALAN ALPIZAR-CORDOBA (Counts 1, 2, 23-24, 27-28)
aka Fiscal
3. JOSE JUAN BANDA-CORONA (Counts 1, 2)
aka Cachetes
4. ROXANA YURISETH GUDINO-VAZQUEZ (Counts 1, 2)
aka Judy
5. MARIO ALBERTO RENTERIA-GONZALEZ (Counts 1, 2, 25)
aka Mocho
6. EDGAR ALONZO BENITEZ (Counts 1, 2, 13, 25, 26)
aka Chaparro
7. JUAN FRANCISCO GONZALEZ-ROSTRO (Counts 1, 2, 31)
aka Escuadra, aka Gordo, aka Pistola, aka Sapo
8. RAUL GONZALEZ (Counts 1, 2, 9-10, 12, 16, 20-21, 29-30)
aka Rula
9. MARIO ALBERTO GONZALEZ (Counts 1-4, 7, 13-15, 17-19)
aka Cookie
10. MIGUEL LNU (Counts 1, 2, 13-14, 17-19)
aka Mike
11. FNU LNU, *aka Yankee* (Counts 1, 2, 6, 19)
12. ALBERTO LNU (Counts 1, 2, 20-22, 29-30)
aka Beto
13. ROSENDO GUERRA (Counts 1, 2, 25-26)
aka Gordo, aka Rosendo Guerra-Barrera
14. FNU LNU *aka Mundo* (Counts 1, 2, 25-26)
15. FRANCISCO JAVIER MERCADO (Counts 1, 2, 20-21, 30)
16. JOSE CESARIO GOMEZ (Counts 1, 2, 9, 11-12, 16)
aka Gordo
17. ROBERTO GOMEZ-HERNANDEZ (Counts 1, 2, 9, 12, 16)
aka Taco
18. FNU LNU, *aka Tono* (Counts 1, 2, 21-22)
19. SEVERO GARZA, Jr. (Counts 1, 2, 5-6, 10, 13-15)
aka Capi, aka Manuel Antonio HERNANDEZ-Melendez

§
§ United States District Court
§ Southern District of Texas
§ CRIMINAL NO. FILED
§ SEP 19 2013
§ David J. Bradley, Clerk of Court

§ SEALED

20. GILBERTO MIRANDA PRADO (Counts 1, 2, 20-21) §
aka Cuate §
21. JUAN OSCAR RODRIGUEZ (Counts 1, 2, 3-6, 13-15) §
aka Cuatro §
22. ROBERTO NERI VILLARREAL (Counts 1-3, 5-6, 2, 31) §
aka Lagrima §
23. RAMON BUSTAMANTE (Counts 1, 2, 14-15) §
aka Mocho §
24. DONACIANO LOPEZ (Counts 1, 2, 13-14) §
aka Chanis §
25. JOSE GUADALUPE GOMEZ-HERNANDEZ §
aka Lupe (Counts 1, 2, 12, 16, 29) §
26. JULIO CESAR LERMA (Counts 1, 2, 20, 29-30) §
aka Licenciado §
27. JOSE ELADIO BENITEZ (Counts 1, 2, 25-26) §
aka Pipo §
28. OSCAR BOBADILLA (Counts 1, 2, 20, 22) §
aka Celestino AYALA-Perez, aka Oscar Valdivia §
29. ORLANDO HERNANDEZ (Counts 1, 2, 23-24, 27-28) §
aka Gordo §
30. RAFAEL R. RODRIGUEZ (Counts 1-4, 7, 13, 18-19) §
aka Rafa §
31. KRISTOPHER RYAN ONEAL (Counts 1-3, 7, 13) §
32. HECTOR DAVILA CORTINA (Counts 1, 2, 7, 14) §
33. WILL TOM FOLLIS (Counts 1, 2, 5) §
aka Rojo, aka Red §
34. JIMMY HOUSTON (Counts 1, 5) §
35. ROBERT STATDLER MITCHELL (Counts 1, 2, 9, 11-12) §
36. SAMUEL CAINE JORDAN (Counts 1, 2, 4, 7, 18-19) §
aka Uncle Sam §
37. JONATHON VICENCIO MENDEZ (Counts 1, 6) §
aka Pelon §
38. MAURILIO CESAR MARTINEZ-AVILA §
aka Cesar (Counts 1-2, 20, 29-30) §
39. RAMON GONZALEZ (Counts 1, 2, 22) §
aka Ramon GONZALEZ-Esparza §
40. CARLOS ERICK GAONA (Counts 1-2, 5-6, 8) §
41. JOSE SEPULVEDA (Counts 1-2, 25-26) §
42. JESUS ANGEL BENITEZ (Counts 1-2, 25-26) §
aka Chuy §
43. MARIO ALBERTO GUTIERREZ (Counts 1-4, 7, 13, 18) §
44. FERNANDO ADRIAN TORRES (Counts 1-3, 5, 14-15) §
aka Pelon §

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| 45. | FNU LNU <i>aka Big UM</i> | (Counts 1, 3, 5-6) | § |
| 46. | JORGE ENRIQUE GONZALEZ | (Counts 1-2, 19) | § |
| 47. | LYDEA GONZALEZ | (Counts 1-2, 19) | § |
| 48. | JORGE LUIS GONZALEZ | (Counts 1-2, 19) | § |
| 49. | RICHARD JAMES WHITE | (Counts 1, 12) | § |
| 50. | CARLOS FRANCISCO GONZALEZ-GONZALEZ | | § |
| | <i>aka Carlitos</i> | (Counts 1-2, 9, 11-12) | § |
| 51. | MARIA LEIJA-HERNANDEZ | (Counts 1-2, 10) | § |
| | <i>aka Mary</i> | | § |
| 52. | MARIA DEL PILAR TREVINO | (Counts 1-2, 20) | § |

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**[21 U.S.C. §846 - Conspiracy to Possess With Intent
to Distribute a Controlled Substance]**

From on or about May 19, 2010, and continuing thereafter up to and including the date of this indictment, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**GALINDO MELLADO-CRUZ aka Comandante Mellado
ALAN ALPIZAR-CORDOBA aka Fiscal
JOSE JUAN BANDA-CORONA aka Cachetes
ROXANA YURISETH GUDINO-VAZQUEZ aka Judy
MARIO ALBERTO RENTERIA-GONZALEZ aka Mocho
EDGAR ALONZO BENITEZ aka Chaparro
JUAN FRANCISCO GONZALEZ-ROSTRO aka Escuadra, aka Gordo, aka Pistola, aka Sapo
RAUL GONZALEZ aka Rula
MARIO ALBERTO GONZALEZ aka Cookie
MIGUEL LNU aka Mike
FNU LNU aka Yankee
ALBERTO LNU aka Beto
ROSENDO GUERRA aka Gordo, aka Rosendo Guerra-Barrera
FNU LNU aka Mundo
FRANCISCO JAVIER MERCADO
JOSE CESARIO GOMEZ aka Gordo
ROBERTO GOMEZ-HERNANDEZ aka Taco**

FNU LNU aka Tono
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio HERNANDEZ-Melendez
GILBERTO MIRANDA PRADO aka Cuate
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima
RAMON BUSTAMANTE aka Mocho
DONACIANO LOPEZ aka Chanis
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe
JULIO CESAR LERMA aka Licenciado
JOSE ELADIO BENITEZ aka Pipo
OSCAR BOBADILLA aka Celestino AYALA-Perez, aka Oscar Valdivia
ORLANDO HERNANDEZ aka Gordo
RAFAEL R. RODRIGUEZ aka Rafa
KRISTOPHER RYAN ONEAL
HECTOR DAVILA CORTINA
WILL TOM FOLLIS aka Rojo, aka Red
JIMMY HOUSTON
ROBERT STATDLER MITCHELL
SAMUEL CAINE JORDAN aka Uncle Sam
JONATHON VICENCIO MENDEZ aka Pelon
MAURILIO CESAR MARTINEZ-AVILA aka Cesar
RAMON GONZALEZ aka Ramon GONZALEZ-Esparza
CARLOS ERICK GAONA
JOSE SEPULVEDA
JESUS ANGEL BENITEZ aka Chuy
MARIO ALBERTO GUTIERREZ
FERNANDO ADRIAN TORRES aka Pelon
FNU LNU aka Big UM
JORGE ENRIQUE GONZALEZ
LYDEA GONZALEZ
JORGE LUIS GONZALEZ
RICHARD JAMES WHITE
CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos
MARIA LEIJA-HERNANDEZ aka Mary
MARIA DEL PILAR TREVINO

did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit an offense defined in Title 21, United States Code, §841, namely, to possess with intent to distribute a controlled substance. The overall scope of the conspiracy involved one thousand (1000) kilograms or more of a mixture or substance

containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§§ 841(a)(1), 841(b)(1)(A)(vii) and 846.

COUNT TWO

[18 U.S.C. §1956 - Conspiracy to Launder Monetary Instruments]

From on or about May 19, 2010, and continuing thereafter up to and including the date of this indictment, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**GALINDO MELLADO-CRUZ aka Comandante Mellado
ALAN ALPIZAR-CORDOBA aka Fiscal
JOSE JUAN BANDA-CORONA aka Cachetes
ROXANA YURISETH GUDINO-VAZQUEZ aka Judy
MARIO ALBERTO RENTERIA-GONZALEZ aka Mocho
EDGAR ALONZO BENITEZ aka Chaparro
JUAN FRANCISCO GONZALEZ-ROSTRO aka Escuadra, aka Gordo,
aka Pistola, aka Sapo
RAUL GONZALEZ aka Rula
MARIO ALBERTO GONZALEZ aka Cookie
MIGUEL LNU aka Mike
FNU LNU aka Yankee
ALBERTO LNU aka Beto
ROSENDO GUERRA aka Gordo, aka Rosendo Guerra-Barrera
FNU LNU aka Mundo
FRANCISCO JAVIER MERCADO
JOSE CESARIO GOMEZ aka Gordo
ROBERTO GOMEZ-HERNANDEZ aka Taco
FNU LNU aka Tono
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
GILBERTO MIRANDA PRADO aka Cuate
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima
RAMON BUSTAMANTE aka Mocho
DONACIANO LOPEZ aka Chanis
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe
JULIO CESAR LERMA aka Licenciado
JOSE ELADIO BENITEZ aka Pipo
OSCAR BOBADILLA aka Celestino AYALA-Perez, aka Oscar Valdivia
ORLANDO HERNANDEZ aka Gordo**

RAFAEL R. RODRIGUEZ aka Rafa
KRISTOPHER RYAN ONEAL
HECTOR DAVILA CORTINA
WILL TOM FOLLIS aka Rojo, aka Red
ROBERT STATDLER MITCHELL
SAMUEL CAINE JORDAN aka Uncle Sam
MAURILIO CESAR MARTINEZ-AVILA aka Cesar
RAMON GONZALEZ aka Ramon GONZALEZ-Esparza
CARLOS ERICK GAONA
JOSE SEPULVEDA
JESUS ANGEL BENITEZ aka Chuy
MARIO ALBERTO GUTIERREZ
FERNANDO ADRIAN TORRES aka Pelon
JORGE ENRIQUE GONZALEZ
LYDEA GONZALEZ
JORGE LUIS GONZALEZ
CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos
MARIA LEIJA-HERNANDEZ aka Mary
MARIA DEL PILAR TREVINO

did knowingly, intentionally and unlawfully combine, conspire, confederate and agree together and with persons known and unknown to the grand jury, to transport, transmit, transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to a place outside the United States, to wit: Mexico, with the intent to promote the carrying on of a specified unlawful activity, and which transactions, in fact, involved the proceeds of illegal drug trafficking as specified in 21 U.S.C. § 841 (a)(1) and as more fully alleged in Count 1 of the indictment, and knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of the specified unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, all in violation of 18 U.S.C. §§1956 (a)(2)(A) and (a)(2)(B)(i), and 1956(h)] and Title 18, United States Code, §2.

COUNT THREE

[21 U.S.C. §841- Possession With Intent to Distribute;

From on or about October 7, 2010, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**MARIO ALBERTO GONZALEZ aka Cookie
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima
RAFAEL R. RODRIGUEZ aka Rafa
KRISTOPHER RYAN ONEAL
MARIO ALBERTO GUTIERREZ
FERNANDO ADRIAN TORRES aka Pelon
FNU LNU aka BIG UM ,**

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT FOUR

[21 U.S.C. §841- Possession With Intent to Distribute]

From on or about October 12, 2010, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**MARIO ALBERTO GONZALEZ aka Cookie
JUAN OSCAR RODRIGUEZ aka Cuatro
RAFAEL R. RODRIGUEZ aka Rafa
SAMUEL CAINE JORDAN aka Uncle Sam
MARIO ALBERTO GUTIERREZ**

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved less than fifty (50) kilograms or more of a

mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(D) and Title 18, United States Code, §2.

COUNT FIVE

[21 U.S.C. §841- Possession With Intent to Distribute]

From on or about November 19, 2010, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima
WILL TOM FOLLIS aka Rojo aka Red
JIMMY HOUSTON
CARLOS ERICK GAONA
FERNANDO ADRIAN TORRES aka Pelon
FNU LNU aka BIG UM**

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT SIX

[21 U.S.C. §841- Possession With Intent to Distribute]

From on or about November 29, 2010, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**FNU LNU aka Yankee
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima**

**CARLOS ERICK GAONA
JONATHAN VICENCIO MENDEZ aka Pelon
FNU LNU aka BIG UM**

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT SEVEN
[18 U.S.C. §1956 - Laundering of Monetary Instruments]

From on or about December 6, 2010, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**MARIO ALBERTO GONZALEZ aka Cookie
RAFAEL R. RODRIGUEZ aka Rafa
KRISTOPHER RYAN ONEAL
HECTOR DAVILA CORTINA
SAMUEL CAINE JORDAN aka Uncle Sam
MARIO ALBERTO GUTIERREZ**

did knowingly and intentionally, aid, abet and assist each other to transport, transmit, and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to the Republic of Mexico with the intent to promote the carrying on a specified unlawful activity and knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, all in violation of 18 U.S.C. §§1956 (a)(2)(A),

(a)(2)(B)(i) and Title 18, United States Code, §2.

COUNT EIGHT

[21 U.S.C. §841- Possession With Intent to Distribute]

From on or about December 16, 2010, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

CARLOS ERICK GAONA

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT NINE

[21 U.S.C. §841- Possession With Intent to Distribute]

From on or about February 23, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

RAUL GONZALEZ aka Rula

JOSE CESARIO GOMEZ aka Gordo

ROBERTO GOMEZ-HERNANDEZ aka Taco

ROBERT STATDLER MITCHELL

CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved fifty (50) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, §2]

COUNT TEN

[18 U.S.C. §1956 - Laundering of Monetary Instruments]

From on or about March 10, 2011 in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**RAUL GONZALEZ aka Rula
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
MARIA LEIJA-HERNANDEZ aka Mary
MARIA DEL PILAR TREVINO**

did knowingly and intentionally, aid, abet and assist each other to transport, transmit, and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to the Republic of Mexico with the intent to promote the carrying on a specified unlawful activity and knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, all in violation of 18 U.S.C. §§1956 (a)(2)(A), (a)(2)(B)(i) and Title 18, United States Code, §2.

COUNT ELEVEN
[18 U.S.C. §1956 - Laundering of Monetary Instruments]

From on or about March 18, 2011 in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

JOSE CESARIO GOMEZ aka Gordo
ROBERT STATDLER MITCHELL
CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos

did knowingly and intentionally, aid, abet and assist each other to transport, transmit, and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to the Republic of Mexico with the intent to promote the carrying on a specified unlawful activity and knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, all in violation of 18 U.S.C. §§1956 (a)(2)(A), (a)(2)(B)(i) and Title 18, United States Code, §2.

COUNT TWELVE
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about March 23, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

RAUL GONZALEZ aka Rula
JOSE CESARIO GOMEZ aka Gordo
ROBERTO GOMEZ-HERNANDEZ aka Taco
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe
ROBERT STATDLER MITCHELL
RICHARD JAMES WHITE
CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved fifty (50) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, §2.

COUNT THIRTEEN
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about April 18, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

EDGAR ALONZO BENITEZ aka Chaparro
MIGUEL LNU aka Mike
MARIO ALBERTO GONZALEZ aka Cookie
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
JUAN OSCAR RODRIGUEZ aka Cuatro
DONACIANO LOPEZ aka Chanis
RAFAEL R. RODRIGUEZ aka Rafa
KRISTOPHER RYAN ONEAL
MARIO ALBERTO GUTIERREZ

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT FOURTEEN
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about April 19, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

MIGUEL LNU aka Mike
MARIO ALBERTO GONZALEZ aka Cookie
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima
RAMON BUSTAMANTE aka Mocho
DONACIANO LOPEZ aka Chanis
HECTOR DAVILA CORTINA
FERNANDO ADRIAN TORRES aka Pelon,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT FIFTEEN

[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about April 22, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**MARIO ALBERTO GONZALEZ aka Cookie
SEVERO GARZA, Jr., aka Capi, aka Manuel Antonio Hernandez-Melendez
JUAN OSCAR RODRIGUEZ aka Cuatro
ROBERTO NERI VILLARREAL aka Lagrima
RAMON BUSTAMANTE aka Mocho
FERNANDO ADRIAN TORRES aka Pelon,**

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT SIXTEEN

[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about May 27, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**RAUL GONZALEZ aka Rula
JOSE CESARIO GOMEZ aka Gordo
ROBERTO GOMEZ-HERNANDEZ aka Taco
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe,**

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and

Title 18, United States Code, §2.

COUNT SEVENTEEN
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about June 16, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

MARIO ALBERTO GONZALEZ aka Cookie
MIGUEL LNU aka Mike,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved fifty (50) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, §2.

COUNT EIGHTEEN
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about June 18, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

MARIO ALBERTO GONZALEZ aka Cookie
MIGUEL LNU aka Mike
RAFAEL R. RODRIGUEZ aka Rafa
SAMUEL CAINE JORDAN aka Uncle Sam
MARIO ALBERTO GUTIERREZ,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and

Title 18, United States Code, §2.

COUNT NINETEEN
[18 U.S.C. §1956 - Laundering of Monetary Instruments]

From on or about June 20, 2011 in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

MARIO ALBERTO GONZALEZ aka Cookie
MIGUEL LNU aka Mike
FNU LNU aka Yankee
RAFAEL R. RODRIGUEZ aka Rafa
SAMUEL CAINE JORDAN aka Uncle Sam
JORGE ENRIQUE GONZALEZ
LYDEA GONZALEZ
JORGE LUIS GONZALEZ,

did knowingly and intentionally, aid, abet and assist each other to transport, transmit, and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to the Republic of Mexico with the intent to promote the carrying on a specified unlawful activity and knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, all in violation of 18 U.S.C. §§1956 (a)(2)(A), (a)(2)(B)(i) and Title 18, United States Code, §2.

COUNT TWENTY
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about August 8, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

RAUL GONZALEZ aka Rula
ALBERTO LNU aka Beto
FRANCISCO JAVIER MERCADO
GILBERTO MIRANDA PRADO aka Cuate
JULIO CESAR LERMA aka Licenciado
OSCAR BOBADILLA aka Celestino AYALA-Perez, aka Oscar Valdivia
MAURILIO CESAR MARTINEZ-AVILA aka Cesar,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT TWENTY ONE
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about August 25, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

RAUL GONZALEZ aka Rula
ALBERTO LNU aka Beto
FRANCISCO JAVIER MERCADO
FNU LNU aka Tono
GILBERTO MIRANDA PRADO aka Cuate,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled

substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT TWENTY TWO
[18 U.S.C. §1956 - Laundering of Monetary Instruments]

From on or about September 15, 2011 in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

ALBERTO LNU aka Beto
FNU LNU aka Tono
OSCAR BOBADILLA aka Celestino AYALA-Perez, aka Oscar Valdivia
RAMON GONZALEZ aka Ramon GONZALEZ-Esparza,

did knowingly and intentionally, aid, abet and assist each other to transport, transmit, and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to the Republic of Mexico with the intent to promote the carrying on a specified unlawful activity and knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity., all in violation of 18 U.S.C. §§1956 (a)(2)(A), (a)(2)(B)(i) and Title 18, United States Code, §2.

COUNT TWENTY THREE
[18 U.S.C. §1956 - Laundering of Monetary Instruments]

From on or about September 18, 2011 in the Southern District of Texas and elsewhere,
and within the jurisdiction of this Court, the defendants,

ALAN ALPIZAR-CORDOBA aka Fiscal
ORLANDO HERNANDEZ aka Gordo ,

did knowingly and intentionally, aid, abet and assist each other to transport, transmit, and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to the Republic of Mexico with the intent to promote the carrying on a specified unlawful activity and knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, all in violation of 18 U.S.C. §§1956 (a)(2)(A), (a)(2)(B)(i) and Title 18, United States Code, §2.

COUNT TWENTY FOUR
[18 U.S.C. 924(c)(1)(A) Carry and Possession of a Firearm During and in Relation to
and in Futherance of a Drug Trafficking Crime]

From on or about September 18, 2011, in the Southern District of Texas and elsewhere,
and within the jurisdiction of this Court, the defendants,

ALAN ALPIZAR-CORDOBA aka Fiscal
ORLANDO HERNANDEZ aka Gordo ,

did knowingly use and possess and aided, abetted and assisted the possession of a firearm, namely a Taurus handgun caliber 38 serial #LBU 16466, during and in relation to, and in

furtherance of, a drug trafficking crime which may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess a controlled substance with intent to distribute in violation of Title 21, United States Code, Section 846, a Schedule I controlled substance, as alleged in Count One of this indictment, all In violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, §2.

COUNT TWENTY FIVE
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about September 30, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

MARIO ALBERTO RENTERIA-GONZALEZ aka Mocho
EDGAR ALONZO BENITEZ aka Chaparro
ROSENDO GUERRA aka Gordo, aka Rosendo Guerra-Barrera
FNU LNU aka Mundo
JOSE ELADIO BENITEZ aka Pipo
JOSE SEPULVEDA
JESUS ANGEL BENITEZ aka Chuy,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT TWENTY SIX
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about October 15, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

EDGAR ALONZO BENITEZ aka Chaparro
ROSENDO GUERRA aka Gordo, aka Rosendo Guerra-Barrera
FNU LNU aka Mundo
JOSE ELADIO BENITEZ aka Pipo
JOSE SEPULVEDA
JESUS ANGEL BENITEZ aka Chuy,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT TWENTY SEVEN
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about October 25, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

ALAN ALPIZAR-CORDOBA aka Fiscal
ORLANDO HERNANDEZ aka Gordo,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT TWENTY EIGHT
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about November 2, 2011, in the Southern District of Texas and elsewhere,
and within the jurisdiction of this Court, the defendants,

ALAN ALPIZAR-CORDOBA aka Fiscal
ORLANDO HERNANDEZ aka Gordo,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT TWENTY NINE
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about November 4, 2011, in the Southern District of Texas and elsewhere,
and within the jurisdiction of this Court, the defendants,

RAUL GONZALEZ aka Rula
ALBERTO LNU aka Beto
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe
JULIO CESAR LERMA aka Licenciado
MAURILIO CESAR MARTINEZ-AVILA aka Cesar,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT THIRTY
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about November 10, 2011, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

RAUL GONZALEZ aka Rula
ALBERTO LNU aka Beto
FRANCISCO JAVIER MERCADO
JULIO CESAR LERMA aka Licenciado
MAURILIO CESAR MARTINEZ-AVILA aka Cesar,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

COUNT THIRTY ONE
[21 U.S.C. 841- Possession With Intent to Distribute]

From on or about February 6, 2012, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

GALINDO MELLADO-CRUZ aka Comandante Mellado
JUAN FRANCISCO GONZALEZ-ROSTRO aka Escuadra, aka Gordo,
aka Pistola, aka Sapo,

did knowingly and intentionally, aid, abet and assist each other to possess with intent to distribute a controlled substance. This violation involved one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, §§ 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, §2.

NOTICES OF CRIMINAL FORFEITURE

**NOTICE OF CRIMINAL FORFEITURE UNDER
TITLE 21, UNITED STATES CODE, SECTION 853**

Under Title 21, United States Code, Section 853, the United States of America gives
notice to the following defendants:

GALINDO MELLADO-CRUZ aka Comandante Mellado (Counts 1 and 31)
ALAN ALPIZAR-CORDOBA aka Fiscal (Counts 1, 24, 27, 28)
JOSE JUAN BANDA-CORONA aka Cachetes (Count 1)
ROXANA YURISETH GUDINO-VAZQUEZ aka Judy (Count 1)
MARIO ALBERTO RENTERIA-GONZALEZ aka Mocho (Counts 1 and 25)
EDGAR ALONZO BENITEZ aka Chaparro (Counts 1, 13, 25, 26)
**JUAN FRANCISCO GONZALEZ-ROSTRO aka Escuadra, aka Gordo,
aka Pistola, aka Sapo (Counts 1 and 31)**
RAUL GONZALEZ aka Rula (Counts 1, 9, 12, 16, 20, 21, 29, 30)
MARIO ALBERTO GONZALEZ aka Cookie (Counts 1, 3, 4, 13-15, 17, 18)
MIGUEL LNU aka Mike (Counts 1, 13, 14, 17, 18)
FNU LNU aka Yankee (Counts 1 and 6)
ALBERTO LNU aka Beto (Counts 1, 20, 21, 29, 30)
ROSENDO GUERRA aka Gordo, aka Rosendo Guerra-Barrera (Counts 1, 25, 26)
FNU LNU aka Mundo (Counts 1, 25, 26)
FRANCISCO JAVIER MERCADO (Counts 1, 20, 21, 30)
JOSE CESARIO GOMEZ aka Gordo (Counts 1, 9, 12, 16)
ROBERTO GOMEZ-HERNANDEZ aka Taco (Counts 1, 9, 12, 16)
FNU LNU aka Tono (Counts 1 and 21)
**SEVERO GARZA, Jr., aka Capi,
aka Manuel Antonio HERNANDEZ-Melendez (Counts 1, 5, 6, 13-15)**
GILBERTO MIRANDA PRADO aka Cuate (Counts 1, 20, 21)
JUAN OSCAR RODRIGUEZ aka Cuatro (Counts 1, 3-6, 13-15)
ROBERTO NERI VILLARREAL aka Lagrima (Counts 1, 3, 5, 6, 14, 15)
RAMON BUSTAMANTE aka Mocho (Counts 1, 14, 15)
DONACIANO LOPEZ aka Chanis (Counts 1, 13, 14)
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe (Counts 1, 12, 16, 29)
JULIO CESAR LERMA aka Licenciado (Counts 1, 20, 29, 30)
JOSE ELADIO BENITEZ aka Pipo (Counts 1, 25, 26)
**OSCAR BOBADILLA aka Celestino AYALA-Perez,
aka Oscar Valdivia (Counts 1 and 20)**
ORLANDO HERNANDEZ aka Gordo (Counts 1, 24, 27, 28)
RAFAEL R. RODRIGUEZ aka Rafa (Counts 1, 3, 4, 13, 18)
KRISTOPHER RYAN ONEAL (Counts 1, 3, 13)

HECTOR DAVILA CORTINA (Counts 1 and 14)
WILL TOM FOLLIS aka Rojo, aka Red (Counts 1 and 5)
JIMMY HOUSTON (Counts 1 and 5)
ROBERT STATDLER MITCHELL (Counts 1, 9, 12)
SAMUEL CAINE JORDAN aka Uncle Sam (Counts 1, 4, 18)
JONATHON VICENCIO MENDEZ aka Pelon (Counts 1 and 6)
MAURILIO CESAR MARTINEZ-AVILA aka Cesar (Counts 1, 20, 29, 30)
RAMON GONZALEZ aka Ramon GONZALEZ-Esparza (Count 1)
CARLOS ERICK GAONA (Counts 1, 5, 6, 8)
JOSE SEPULVEDA (Counts 1, 25, 26)
JESUS ANGEL BENITEZ aka Chuy (Counts 1, 25, 26)
MARIO ALBERTO GUTIERREZ (Counts 1, 3, 4, 13, 18)
FERNANDO ADRIAN TORRES aka Pelon (Counts 1, 3, 5, 14, 15)
FNU LNU aka Big UM (Counts 1, 3, 5, 6)
JORGE ENRIQUE GONZALEZ (Count 1)
LYDEA GONZALEZ (Count 1)
JORGE LUIS GONZALEZ (Count 1)
RICHARD JAMES WHITE (Counts 1 and 12)
CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos (Counts 1, 9, 12)
MARIA LEIJA-HERNANDEZ aka Mary (Count 1)
MARIA DEL PILAR TREVINO (Count 1)

that, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846 as charged in Counts 1, 3-6, 8, 9, 12-18, 20, 21, and 25-31, the United States of America shall forfeit:

(a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation; and

(b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

The property to be forfeited includes, but is not limited to, a forfeiture money judgment for which the defendants may be jointly and severally liable.

**NOTICE OF CRIMINAL FORFEITURE UNDER
TITLE 18, UNITED STATES CODE, SECTION 982(a)(1)**

Under Title 18, United States Code, Section 982(a)(1), the United States of America
gives notice to the following defendants:

GALINDO MELLADO-CRUZ aka Comandante Mellado (Count 2)
ALAN ALPIZAR-CORDOBA aka Fiscal (Counts 2 and 23)
JOSE JUAN BANDA-CORONA aka Cachetes (Count 2)
ROXANA YURISETH GUDINO-VAZQUEZ aka Judy (Count 2)
MARIO ALBERTO RENTERIA-GONZALEZ aka Mocho (Count 2)
EDGAR ALONZO BENITEZ aka Chaparro (Count 2)
JUAN FRANCISCO GONZALEZ-ROSTRO aka Escuadra, aka Gordo,
aka Pistola, aka Sapo (Count 2)
RAUL GONZALEZ aka Rula (Counts 2 and 10)
MARIO ALBERTO GONZALEZ aka Cookie (Counts 2, 7, 19)
MIGUEL LNU aka Mike (Counts 2 and 19)
FNU LNU aka Yankee (Counts 2 and 19)
ALBERTO LNU aka Beto (Counts 2 and 22)
ROSENDO GUERRA aka Gordo, aka Rosendo Guerra-Barrera (Count 2)
FNU LNU aka Mundo (Count 2)
FRANCISCO JAVIER MERCADO (Count 2)
JOSE CESARIO GOMEZ aka Gordo (Counts 2 and 11)
ROBERTO GOMEZ-HERNANDEZ aka Taco (Count 2)
FNU LNU aka Tono (Counts 2 and 22)
SEVERO GARZA, Jr., aka Capi,
aka Manuel Antonio HERNANDEZ-Melendez (Counts 2 and 10)
GILBERTO MIRANDA PRADO aka Cuate (Count 2)
JUAN OSCAR RODRIGUEZ aka Cuatro (Count 2)
ROBERTO NERI VILLARREAL aka Lagrima (Count 2)
RAMON BUSTAMANTE aka Mocho (Count 2)
DONACIANO LOPEZ aka Chanis (Count 2)
JOSE GUADALUPE GOMEZ-HERNANDEZ aka Lupe (Count 2)
JULIO CESAR LERMA aka Licenciado (Count 2)
JOSE ELADIO BENITEZ aka Pipo (Count 2)
OSCAR BOBADILLA aka Celestino AYALA-Perez,
aka Oscar Valdivia (Counts 2 and 22)
ORLANDO HERNANDEZ aka Gordo (Counts 2 and 23)
RAFAEL R. RODRIGUEZ aka Rafa (Counts 2, 7, 19)
KRISTOPHER RYAN ONEAL (Counts 2 and 7)
HECTOR DAVILA CORTINA (Counts 2 and 7)
WILL TOM FOLLIS aka Rojo, aka Red (Count 2)

ROBERT STATDLER MITCHELL (Counts 2 and 11)
SAMUEL CAINE JORDAN aka Uncle Sam (Counts 2, 7, 19)
MAURILIO CESAR MARTINEZ-AVILA aka Cesar (Count 2)
RAMON GONZALEZ aka Ramon GONZALEZ-Esparza (Count 2 and 22)
CARLOS ERICK GAONA (Count 2)
JOSE SEPULVEDA (Count 2)
JESUS ANGEL BENITEZ aka Chuy (Count 2)
MARIO ALBERTO GUTIERREZ (Counts 2 and 7)
FERNANDO ADRIAN TORRES aka Pelon (Count 2)
JORGE ENRIQUE GONZALEZ (Counts 2 and 19)
LYDEA GONZALEZ (Counts 2 and 19)
JORGE LUIS GONZALEZ (Counts 2 and 19)
CARLOS FRANCISCO GONZALEZ-GONZALEZ aka Carlitos (Counts 2 and 11)
MARIA LEIJA-HERNANDEZ aka Mary (Counts 2 and 10)
MARIA DEL PILAR TREVINO (Counts 2 and 10)

that, upon conviction of an offense in violation of Title 18, United States Code, Section 1956 as charged in Counts 2, 7, 10, 11, 19, 22, and 23, the United States of America shall forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

The property to be forfeited includes, but is not limited to, a forfeiture money judgment for which the defendants may be jointly and severally liable.

**SUBSTITUTE ASSETS PROVISION UNDER
TITLE 21, UNITED STATES CODE, SECTION 853(p) AND
TITLE 28, UNITED STATES CODE, SECTION 2461(c)**

If any of the property described in the foregoing notices of criminal forfeiture, as a result of any act or omission of a defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

- (e) has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 981(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:
Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

By:


Eric D. Smith
Assistant United States Attorney